UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Paul Schachter, : CHAPTER 13

Debtor : CASE NO. 14-17079-ref

MOTION TO CONVERT CHAPTER 13 CASE TO A CHAPTER 7

Paul Schachter, Debtor, by and through his counsel, Brenna H. Mendelsohn, Esquire, of Mendelsohn & Mendelsohn, P.C. files this Motion to Convert debtor's instant Chapter 13 Bankruptcy to a Chapter 7 Bankruptcy and in support thereof, represents the following:

- 1. The debtor, Paul Schachter, filed a Petition for relief under 11 U.S.C. Chapter 13 of the Federal Code on September 4, 2014 to case number 14-17079-ref and this case is still pending before this Honorable Court.
- 2. The debtor seeks an Order allowing his case to be converted from a Chapter 13 to a Chapter 7 Bankruptcy.
- 3. The debtor no longer has the monthly disposable income to feasibly remain in a Chapter 13 Plan.

WHEREFORE, the debtor prays that this Honorable Court enter an Order allowing Debtor to convert his Chapter 13 case to a Chapter 7 case as it is the more appropriate form of relief under the circumstances.

Respectfully Submitted,

/s/ Brenna H. Mendelsohn Brenna H. Mendelsohn, Esquire Attorney for Debtors

Dated: March 1, 2017